**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**



| Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies. | Rulemaking 06-04-009 (Filed April 13, 2006) |
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**COMMENTS OF SIERRA PACIFIC POWER COMPANY (U 903 E) ON PROPOSED INTERIM OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES**

February 28, 2008

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**COMMENTS OF SIERRA PACIFIC POWER COMPANY (U 903 E) ON PROPOSED INTERIM OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES**

Sierra Pacific Power Company (Sierra) respectfully submits these Comments on the Proposed Decision (PD) of President Peevey, pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure and instructions of the Assigned Commissioner and Administrative Law Judges.

It is Sierra's considered view that the PD represents the kind of seminal decision that this very ambitious project requires at this point; perhaps as hoped for if not altogether expected considering the enormous amount of material and competing theories and pragmatic considerations the Commission had to consider in developing it. At the heart of the PD is the very creative discovery, if that is what it may be called, that a slightly different view of point of regulation, placing compliance obligations on the "deliverer" of electric power, best promises to achieve the objectives of the program in a manner that also resolves or avoids many difficulties associated with any other approach.

In these Comments, Sierra suggests that the PD errs only in failing to appreciate the fullness of the deliverer approach and its potential for even broader application to providers of electric power supply to California consumers. Specifically, Sierra proposes that the PD's principles may appropriately apply and, indeed, should be applied to Sierra as a multi-jurisdictional utility (MJU), and that the specialized and disparate treatment of MJUs suggested by the PD should be abandoned. As suggested below, these exceptions to the PD's general principle are not necessary, nor are they in the scheme of things a good idea. They also raise the specter of discrimination, a legal difficulty that the PD otherwise so deftly avoids. Attachment A to these Comments contains Sierra's legal analysis demonstrating that exclusion of Sierra from the deliverer approach is unlawful under Interstate Commerce principles.

Sierra does not purport to comprehensively summarize the PD or its reasons for concluding that the deliverer approach best meets the objectives of the regulatory program and in the least intrusive and most logical manner. The integrity and clarity of these rationales are one of the things about the PD that make it so singular. At the heart of it, however, what the PD concludes is that maximum benefit is had by directing the point of regulation at the entity that has first responsibility for, that is, practical ownership of, electric power in California, wherever that power came from in the first instance.

> By choosing a deliverer *point of regulation* we are simply choosing a trigger that determines which entities have to comply, but what is being regulated is the amount of GHGs being produced in California or to supply electricity to customers located in California.

PD, FF 15. This subtle twist on the two erstwhile leading contenders for point of regulation, first seller or load based, resolves many problems; most notably, we think, it resolves difficult and controversial matters on interference with commerce associated with the former, and nightmarish practical and administratively complex tracking, monitoring and reporting associated with the latter.

Having made this discovery, however, the PD somewhat inexplicably abandons it in the multi-jurisdictional utility context, compromising or losing altogether the benefits of the deliverer approach in that case. In doing so, the PD also subjects Sierra, almost uniquely, to the full range of administrative burdens that both diminish the benefits of the program to California and shackle Sierra with duties and operational limitations that are completely disproportional to its position as a California electric power provider.

In carving out MJUs for treatment at the load-based point of regulation, the PD relies entirely on two observations, one of which is not important and the second of which isn't even necessarily true.

First, the PD notes that Sierra largely supplies its California customers with imported resources, the delivery of which will not involve an E-tag, which is useful in identifying the specific source of generation and its characteristics. While true, this is not a unique problem and it can easily be managed; indeed, dealing with transactions at the deliverer point will already require, in some instances, alternative mechanisms to E-tags, as the PD points out: "However, the point of delivery at which ownership is used for AB32 compliance purposes should be physically within the state. … [A]lternative documentation may need to be used to identify the owner of imports that do not have E-tags at the point of delivery to the California grid." PD at 67. (Emphasis added.) Sierra proposes simply that the Commission leave open this alternative documentation question for it, as it is already an open question that must be resolved anyway in other contexts.

The PD's second observation in support of distinguishing MJUs like Sierra is that the source(s) of power used to serve its California customers cannot be distinguished from sources used to supply its entire balancing authority. Similarly, this tendency is also historically true (and is true today) but there is no logical or institutional necessity for it. On a practical level Sierra is as capable of searching out and securing supply for its California customers from whatever sources it can for reasons of cost or GHG emissions effects. By excluding Sierra from the deliverer point of regulation, however, the PD closes the door on that flexibility for all time. This seems to Sierra to be both a bad outcome for California, which wants to encourage the best supply options for its customers, and completely unnecessary since if nothing changes in supply, the deliverer approach still captures the effects of those supply realities. What <u>does change</u> if the deliverer approach is applied consistently is that Sierra is in a position to target desirable supply options directly to its California customers, with regulatory approval, and without the massive reporting that will burden both Sierra in having to reporting the entirety of its power portfolio and California regulators who will have to wade through that material.

Sierra has considered the possibility that the exclusion of MJUs from the deliverer point of regulation is merely vestigial of the prior idea, perhaps an idea that seemed a "given" at the time, that a load-based point of regulation would carry the day generally. The PD notes, specifically, the prior determination that MJUs, for reporting purposes currently being considered by CARB, would provide information on every power transaction individually for its balancing authority, with pro rationing by its California customer base used to calculate its "California" share of GHG emissions. PD at 78; cf. D.07-09-017. As noted, this reporting convention is completely unnecessary under the deliverer approach. As an adjunct of failing to include Sierra in the deliverer point of regulation approach, it is also discriminatory, as next discussed.

It is undisputed that the PD treats Sierra and PacifiCorp differently from other deliverers in the California system. PD at 75. The PD justifies this disparate treatment on two grounds, the only two bases, as noted above, for distinguishing Sierra generally. First, because Sierra has a single, integrated, and trans-border service territory, it imports power without using E-tags.

Second, the PD states that because the sources of electricity that serve California are indistinguishable from the sources of power that serve Nevada, measurement protocols applicable to other retail providers are not applicable to Sierra. Neither assertion is substantiated in the PD.

As a consequence, the PD proposes to regulate Sierra and PacifiCorp not as deliverers, like all other retail providers in California, but rather on a retail provider basis. PD at 79. Apparently, the PD recommends that they be regulated on a load-based approach.[1] Accordingly, the PD recommends that *because* of Sierra's out-of-state economic interests, it should be treated differently from in-state providers.

One problem with this approach is that the PD does not consider the burden that disparate treatment will impose on Sierra. One of the reasons cited by the PD for not using the deliverer approach to MJUs is that "the measurement protocols that apply to other deliverers are not applicable." By adopting load-based regulation solely for MJUs, the PD is recommending that CARB gather more information about imports by MJUs than on imports by in-state retail sellers. Indeed, the PD recognizes that the burden of using a retail provider point of regulation would be greater on the complying party than the deliverer approach:

> Similarly, the in-state generator/retail provider for imports option is also administratively complex. In order to make such a system work and hold retail providers responsible only for their imported power, their entire electricity portfolio would need to be tracked, with the in-state generation portion netted out to determine the portion of the portfolio attributable to imports. Thus, all of the tracking or attribution necessary under the retail provider point of regulation is also necessary under this alternative, with an added layer of complexity to conduct the proper accounting to subtract out in-state generation. Thus, we also find the in-state generator/retail provider for imports point of regulation option to be less preferred under this criterion.

[1] "Apparently" because the PD does not clearly and affirmatively state that this is the case, but quotes PacifiCorp's comments.

PD at 59-60

In addition, not only is the burden of acquiring and reporting more voluminous and complex, but that burden is inordinate to Sierra's in-state economic interests. Sierra must operate in two states according to two regulatory systems. It starts with a disproportionate administrative burden of complying with all of California's laws, even though its California revenues make up a very small percentage of its total revenues. The proposed regulatory model not only fails to take this into account, but heaps on additional regulatory complexities not imposed on in-state utilities. This discriminatory treatment of what are essentially out-of-state interests will cause Sierra to incur proportionately greater costs per ratepayer to comply with a retail seller regulatory scheme than with the deliverer approach.

There is another reason why applying a retail seller approach only to MJUs is discriminatory and thus a potential burden on interstate commerce. Sierra imports electricity to service its customers in California on a retail basis. Traditionally, Sierra has not procured supplies specially for its California customers. However, with the enactment of AB 32, Sierra now has a unique challenge to reduce its carbon "footprint" just for its California customers, presenting the prospect that Sierra must change the mix of power it delivers to California from the mix delivered to its Nevada customers in order to comply with California law. However, the retail seller approach would assign a single carbon emissions factor to Sierra's entire retail electrical load, no matter where electrical service is taken. Thus, under this regulatory approach, Sierra would not be able to earmark cleaner power to California in order to comply with its California obligations.

Not only does this special regulatory approach seek to impose California obligations upon neighboring states, but it is discriminatory in that it gives Sierra less flexibility to comply with its California obligations than would be granted to in-state utilities under the deliverer approach. This is true because in-state retail sellers both generate power in-state and import power into California on a wholesale basis. Consequently, they have the flexibility to change their product mix by procuring energy supplies solely to comply with California laws. The retail seller approach denies MJUs that right because they would not have similar flexibility to procure cleaner energy supplies just for California. Thus, the proposed approach discriminates against and burdens Sierra in a far greater manner than the alternative mode of regulation of in-state economic interests.

Sierra respectfully submits that the PD should be modified such that the deliverer approach adopted there be applicable uniformly, including specifically to MJUs like Sierra. All that remains for the deliverer approach to work well with Sierra is development of appropriate documentation, akin to an E-tag, for its supply for California customers. Accordingly, Sierra proposes that Finding of Fact 25 be deleted:

> ~~25. It is reasonable to regulate the GHG emissions associated with the multi-jurisdictional utilities' deliveries of electricity to the California grid on a retail provider basis, with GHG emissions attributed based on a proportional share of their electricity sales in California.~~

And replaced with a new finding of fact to the effect:

> 25. For MJUs and in other situations where appropriate, it is reasonable to use alternative documentation to identify imports of electric power that do not have E-tags at the point of delivery to the California grid.

Furthermore, since approval of the deliverer approach makes irrelevant and unnecessary much of the least tractable and most burdensome reporting conventions currently being considered, Decision 07-09-017 should be modified accordingly.

Respectfully submitted,

Dated: February 28, 2008

/s/

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**Attachment A**

**Regulating Multi-Jurisdictional Utilities using a Load-Based Approach Violates the Dormant Commerce Clause.**

While the PD analyzes and concludes that the deliverer point of regulation does not violate the U.S. Commerce Clause, the Commission has not adequately considered whether treating MJUs differently than other deliverers in the system violates the Commerce Clause. Sierra believes that the retail seller or load-based point of regulation proposed especially for MJUs constitutes differential treatment that would burden out-of-state economic interests because it (1) places an inordinate burden on MJUs to report and track their power imported into California, and (2) would limit for MJUs the flexibility enjoyed by in-state retail providers to import cleaner power to serve California load.

As the PD and legions of authorities before it have recognized, "[u]nder the dormant Commerce Clause, a state's laws or regulations may be unconstitutional if there is a differential treatment of in-state and out-of state economic interests that benefits the former and burdens the latter." PD at p. 75. Both Sierra and PacifiCorp are out-of-state companies with relatively small operations in California.[2] Sierra procures virtually all of the energy used to serve its California service territory from outside of California. Thus, not only are its economic interests primarily out-of-state economic interests but virtually all of the energy it procures to serve California load is imported into the state.

It is undisputed that the PD treats Sierra and PacifiCorp differently from other deliverers in the California system. PD at 75. The PD justifies this disparate treatment on two grounds. First, because Sierra has a single, integrated, and trans-border service territory, it imports power without using E-tags. Second, the PD states that because the sources of electricity that serve

[2] Sierra's operations are small both in comparison to its operations as a whole and to the rest of California.

California are indistinguishable from the sources of power that serve Nevada, measurement protocols applicable to other retail providers are not applicable to Sierra. Neither assertion is substantiated in the PD.

As a consequence, the PD proposes to regulate Sierra and PacifiCorp not as deliverers, like all other retail providers in California, but rather on a retail provider basis. PD at 79. Accordingly, the PD recommends that *because* of Sierra's out-of-state economic interests, it should be treated differently from in-state utilities.

One problem with this approach is that the PD does not consider the burden that disparate treatment will have on Sierra. One of the reasons cited by the PD for not using the deliverer approach for MJUs is that "the measurement protocols that apply to other deliverers are not applicable." By adopting load-based regulation on MJUs, the PD is recommending that CARB gather more information about imports by MJUs than on imports by in-state retail sellers. Indeed, the PD recognizes that the burden of using a retail provider point of regulation would be greater than with the deliverer approach:

> Similarly, the in-state generator/retail provider for imports option is also administratively complex. In order to make such a system work and hold retail providers responsible only for their imported power, their entire electricity portfolio would need to be tracked, with the in-state generation portion netted out to determine the portion of the portfolio attributable to imports. Thus, all of the tracking or attribution necessary under the retail provider point of regulation is also necessary under this alternative, with an added layer of complexity to conduct the proper accounting to subtract out in-state generation. Thus, we also find the in-state generator/retail provider for imports point of regulation option to be less preferred under this criterion. (PD at p. 59-60)

In addition, not only is the burden of acquiring and reporting more voluminous and complex, but that burden is inordinate to Sierra's in-state economic interests. Sierra must operate in two states according to two regulatory systems. It starts with a disproportionate administrative burden of complying with all of California's laws, even though its California revenues make up a very small percentage of its total revenues. The proposed regulatory model not only fails to take this into account, but heaps on additional regulatory complexities not imposed on in-state utilities. This discriminatory treatment of what are essentially out-of-state interests will cause Sierra to incur proportionately greater costs per ratepayer to comply with a retail seller regulatory scheme than application of the deliverer approach.

There is an additional reason why applying a retail seller approach only to MJUs is discriminatory and a potential burden on Interstate Commerce. Sierra imports electricity to service its customers in California on a retail basis. Traditionally, Sierra has not procured supplies just for its California customers. However, with the enactment of AB 32, Sierra now has a unique challenge to reduce its carbon "footprint" just for its California customers. So now Sierra must consider changing the mix of power it delivers to California from the mix delivered to its Nevada customers. However, the retail seller approach would assign a single carbon emissions factor to Sierra's entire retail electrical load, no matter where electrical service is taken. Thus, under this regulatory approach, Sierra would not be able to earmark cleaner power to California in order to comply with its California obligations.

This discriminatory approach gives Sierra less flexibility to comply with its California obligations than the Commission would grant to in-state utilities under the deliverer approach. This is true because in-state retail sellers both generate power in-state and import power into California on a wholesale basis. Consequently, they have the flexibility to change their product mix by procuring wholesale supplies solely to comply with California laws. The retail seller approach denies MJUs that right because it would not permit Sierra the flexibility to procure cleaner supplies just for California. Thus, the proposed approach discriminates against and burdens Sierra unlike in-state economic interests. Accordingly, the PD's proposal to treat MJUs differently for purposes of GHG emissions appears to violate the Commerce Clause of the U.S. Constitution.

Certificate of Service

I hereby certify that I have this day served a copy of "Comments Of Sierra Pacific Power Company (U 903 E) On Proposed Interim Opinion On Greenhouse Gas Regulatory Strategies" on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on February 28, 2008 at Sacramento, California

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